



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007


June 21, 2020

Application granted. Time is excluded until June 26, 2020, under the Speedy Trial Act, pursuant to 18 U.S.C. Section 3161(h)(7)(a).

BY ECF AND EMAIL

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

SO ORDERED.



Ronnie Abrams, U.S.D.J.
June 22, 2020

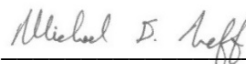
Re: United States v. Joandra Tejada Gonzalez, 18 Cr. 640 (RA)

Dear Judge Abrams:

The Government writes to respectfully request that the Court exclude time, pursuant to the Speedy Trial Act, between today and the date of the initial conference in this case—June 26, 2020 at 11:30 a.m. Briefly, by way of background, the defendant is charged in two counts of Indictment 18 Cr. 640 (RA) with conspiracy to commit wire fraud (Count One) and aggravated identity theft (Count Fifteen). She surrendered on June 17, 2020; was presented and arraigned (remotely) before Judge James L. Cott, pursuant to Your Honor's referral; entered a not-guilty plea; and was ordered released on bail, pursuant to an agreed-upon bail package. (Dkts. 294, 295).¹ In advance of the initial conference, the Government respectfully requests that the time between today and June 26, 2020 be excluded pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), to allow the parties time (1) to begin producing and reviewing discovery, and (2) to continue engaging in discussions regarding a potential pretrial resolution of this matter. Defense counsel—Deveraux L. Cannick, Esq.—consents to this request.

Respectfully submitted,

AUDREY STRAUSS
Acting United States Attorney for
the Southern District of New York

By: 

Michael D. Neff / Brett M. Kalikow
Assistant United States Attorneys
(212) 637-2107/2220

cc: Deveraux L. Cannick, Esq. (via ECF)

¹ At the arraignment, Judge Cott denied the Government's request to exclude time, because the parties had not yet scheduled the initial conference with the Court. This is therefore the Government's second request to exclude time.